

IN THE  
Supreme Court of the United States  
OCTOBER TERM, 1989

Supreme Court, U.S.  
**FILED**

**MAR 22 1990**

JOSEPH F. SAPNIOL, JR.  
CLERK

INTERNATIONAL SOCIETY FOR KRISHNA  
CONSCIOUSNESS OF CALIFORNIA, *et al.*,  
*Petitioners,*

*v.*

ROBIN GEORGE AND MARCIA GEORGE,  
*Respondents.*

On Petition For Writ Of Certiorari To  
The Court Of Appeal Of The  
State Of California,  
Fourth Appellate District

BRIEF OF RESPONDENT, NICO KUYT,  
IN SUPPORT OF  
PETITION FOR WRIT OF CERTIORARI

R. WILSON MONTJOY II  
*Counsel of Record*  
BRUNINI, GRANTHAM, GROWER  
& HEWES  
1400 Trustmark Building  
Post Office Drawer 119  
Jackson, Mississippi 39205  
(601) 948-3101

ROBERT C. LATHAM  
ADAMS, FORMAN, TRULY,  
SMITH & BRAMLETTE  
Post Office Box 1307  
Natchez, Mississippi 39121-1307  
(601) 442-6495

*Attorneys for Respondent*

March 22, 1990

IN THE  
Supreme Court of the United States  
OCTOBER TERM, 1989

---

No.89-1398

---

INTERNATIONAL SOCIETY FOR KRISHNA  
CONSCIOUSNESS OF CALIFORNIA, *et al.*,  
*Petitioners,*

v.

ROBIN GEORGE AND MARCIA GEORGE,  
*Respondents.*

---

On. Petition For Writ Of Certiorari To  
The Court Of Appeal Of The  
State Of California,  
Fourth Appellate District

---

BRIEF OF RESPONDENT, NICCO KUYT,  
IN SUPPORT OF  
PETITION FOR WRIT OF CERTIORARI

---

Respondent, Nico Kuyt, files this brief pursuant to Sup. Ct. R. 12.4. Respondent adopts, for purposes of this brief, the material in the Petition of the International Society for Krishna Consciousness of California, of New York, of Louisiana and of Canada (hereinafter "ISKCON") under the headings, "Questions Presented," "Opinions Below," "Jurisdiction" and "Constitutional Provisions Involved."

### STATEMENT

Respondent adopts, for purposes of this brief, the material in ISKCON's Petition under the heading "Statement," except as follows. Respondent denies that ISKCON officials or Respondent, "concocted false letters from Robin to her parents and others, which stated that she had left the religion and was travelling in Mexico." ISKCON Pet. at 3.

### REASONS FOR GRANTING THE PETITION

Respondent adopts, for purposes of this brief, the material in ISKCON's Petition under the heading "Reasons for Granting the Petition," except as follows. Respondent does not agree with the following statement, at least as the same may be applied to Respondent: "Petitioners acknowledge that some of their actions were unlawful and could be made the basis for civil liability under proper legal standards." ISKCON Pet. at 9.

### CONCLUSION

The Petition for a Writ of Certiorari should be granted.

Respectfully submitted,

R. WILSON MONTJOY II

*Counsel of Record*

BRUNINI, GRANTHAM, GROWER  
& HEWES

1400 Trustmark Building

Post Office Drawer 119

Jackson, Mississippi 39205

(601) 948-3101

ROBERT C. LATHAM

ADAMS, FORMAN, TRULY,

SMITH & BRAMLETTE

Post Office Box 1307

Natchez, Mississippi 39121-1307

(601) 442-6495

*Attorneys for Respondent*

March 22, 1990